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RECEIPT

April 25, 2002

Anthony Dale  
Federal Communications Commission  
455 12th Street, S.W.  
Washington, DC 20554

RECEIVED - FCC

APR 25 2002

Federal Communication Commission  
Bureau/Office

Dear Mr. Dale:

Enclosed, pursuant to Condition V, Paragraph 16 and Attachment A of Appendix D to the order approving the merger between Bell Atlantic and GTE ("Merger Order") are Verizon's performance measurement results for March 2002. We are providing you with disks containing ASCII files of the results in the format you requested. An additional disk provides two reports that were requested by CCB staff. One report summarizes the voluntary payments for Performance Plan Year 1 through the February 2002 performance month by state and the other report provides a summary by metric for the same time period. Verizon recently discovered that the Performance Assurance Plan calculation for qualifying sub-measurements captured results from the last two previous months regardless of whether the standard was missed, rather than the two most recent previous months when the standard was missed. An examination of the impact of the miscalculation revealed that this resulted in one underpayment of \$16,525 for the November data month for Virginia in the former BA service area. However, by the time the calculation error was discovered, the PAP calculations for the next data month for that state resulted in a credit balance. The calculation has been corrected for payment calculations of the February 2002 data month and no other instances of payment calculations have occurred due to the incorrect calculation.

Individual CLEC results for both the former GTE states and Bell Atlantic states are available on the web site. These CLEC-specific reports should be treated confidentially in accordance with the terms of the Merger Order, Appendix D, Attachment A, ¶ 1.

As we have previously mentioned, Verizon has discovered that, for some measurements, the level of disaggregation called for in Attachments A-2a and A-2b of Appendix D differs from the level of disaggregation specified in Attachments A-5a and A-5b. The enclosed performance measurement results provide data at the more disaggregated level specified in Attachments A-5a and A-5b.

In some instances the metrics in Attachments A-2a and A-2b and included in our monthly reports are not included in Attachments A-5a and A-5b. To address these differences, Verizon has been implementing the approved redline changes for Attachments A-5a and A-5b coincident with the corresponding approved redline changes to Attachments A-2a and A-2b as described in the implementation schedule provided to you on December 26, 2001. Payment liability for these metrics will begin with the first data month of implementation.

In addition, in a few instances, the measurements reported do not precisely match the definitions stated in Attachments A-2a and A-2b. The Attachment to this letter describes those instances in which there are variations.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dee May".

Attachment

Without Confidential Enclosures

cc: Mark Stone (w/o confidential enclosures)  
Frank Hopwood (w/confidential enclosures)  
Whitey Thayer (w/confidential enclosures)  
Ellen becker (w/confidential enclosures)

**March 2002****Definitional Status for Performance measures:**

Certain issues affect months previously reported, as noted below.

**East States:****PO-1 OSS Response Time****PO-2 OSS Interface Availability**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
EDI – Resale, UNE PO-1-01, PO-1-02 (NJ only), PO-1-03, PO-1-06, PO-2-02	November 2001 – December 11, 2001	Issue previously documented in December 26, 2001 letter incorrectly described the issue as involving certain transactions. Correctly stated, due to an EDI EnView process error, all transactions failed.

**BI-2- Timeliness of Carrier Bill**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
All (NJ Only)	January 2002 –February 2002	Metric did not include the CABS bills for New Jersey. Process will be corrected with the March 2002 data month.

**PR-3 Completed within Specified Number of Days (1-5 Lines)**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
Resale, UNE, Retail POTS – Total PR-3-08, PR-3-09 (NH, VT, RI, ME only)	January 2001 – November 2001	Issue previously documented in December 26, 2001 cover letter stated that an error to the PR metrics caused by a logic flaw in system design had been corrected with the December 2001 data month. Investigation has revealed that the process was not corrected with the December 2001 data month and the issue remains under investigation to determine what corrective action, if any, is appropriate.

**PR-4 Missed Appointments****PR-5 Facility Missed Orders**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
Resale, Retail, 2 Wire Digital, POTS – Total, xDSL PR-4-02, PR-4-04, PR-4-05, PR-5-03 (NJ only)	July 2000 – November 2001	Issue previously documented in the February 25, 2002 cover letter incorrectly indicated that a correction to the PR metrics had been completed with the December 2001 data month. Actual completion date is under development.

**PR-6 Installation Quality**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
UNE POTS - Loop PR-6-02	July 2000 – November 2001	The denominator included 2-Wire Digital and 2-Wire xDSL loops when only analog loops should be included. Process was corrected with the December 2001 data month.

**MR-2 Trouble Report Rate**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
Specials MR-2-01 (ME, NH, VT)	July 2000 – March 2002	Official circuits were included in the denominator and Flexpath circuits were counted as 24 DSO circuits in the denominator, rather than as 1 circuit. Process will be corrected with the April 2002 data month.

**West States:****OR-2 Reject Timeliness**

<b>Product</b>	<b>Month(s)</b>	<b>Comment</b>
Resale, UNE Loop Designed, UNE Loop Non- designed, UNE Port, UNE Platform OR-2-02, OR-2-04, OR-2-05, OR-2-06	October 2001– February 2002	Some flow through rejects were incorrectly reported as non flow-through rejects (OR-2-04, 2-05, 2-06) due to a programming error. Process was corrected with the March 2002 data month.